

**THE LAW  
OFFICES OF  
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**VIA ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 701  
New York, New York 10007

**Re: United States v. Michael Shvartsman, et. al., No. 23 Cr. 307 (LJL)**

Dear Judge Liman:

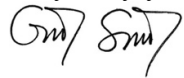
I am counsel to the above-referenced defendant.

I write to request that the Court enter the enclosed proposed order, which will exonerate the defendant's bail, release the defendant and his suretors from any liability in connection with the personal recognizance bond entered in connection with this matter, and direct the Pretrial Services Agency or any agency of the United States to deliver Mr. Shvartsman's Canadian passport and any immigration related documentation in its custody to undersigned counsel.

The BOP website confirms that Mr. Shvartsman has surrendered to the BOP's facility in Coleman, Florida, so Mr. Shvartsman's bail should now be exonerated. The Canadian passport was surrendered to the FBI at the time of arrest in June, 2023, and was subsequently released by the FBI on July 20, 2023, to Pretrial Services, should now be returned to Mr. Shvartsman, as it is relevant to Mr. Shvartsman's immigration proceedings.

Therefore, I respectfully request that the Court enter the Order enclosed with this letter as Exhibit A, which will fully exonerate the defendant's bail, and direct the return of his passport and any immigration related documents to his undersigned counsel.

Very truly yours,



Grant J. Smith  
Counsel to Michael Shvartsman

cc: All counsel of record via ECF